

EXHIBIT D

**INDEX IN SUPPORT OF MOTION TO SEAL
OCTOBER 25 JOINT LETTER RE JJHCS CUSTODIANS**

Material/Title of Document	Basis for Sealing (Legitimate Private or Public Interest Which Warrant the Relief Sought)	Clearly Defined and Serious Injury that Would Result if Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Redactions related to Janssen Americas Leadership Team (“JALT”): Pp. 3–4; Exs. 8–12	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Redactions related to Blasine Penkowski:	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to	JJHCS requests the sealing of only the information that will reveal confidential information that is	None	None

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Pp. 4 & 18; Exs. 13–31	the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	not known to the general public. No less restrictive alternative is available or practicable.		
Redactions related to Scott White: Pp. 4–5 & 19; Exs. 11, 18, 19 & 32–46	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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Redactions related to Ernie Knewitz: Pp. 5 & 19–20; Exs. 10–11, 34 & 47–49	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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Redactions related to Karen Lade: Pp. 6 & 20–21; Exs. 50–61	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Redactions related to Juliette Deshaies: Pp. 6–7 & 21; Exs. 62–73	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive	None	None

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	exhibits contain sensitive business information, including the administration of the CarePath program.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	alternative is available or practicable.		
Redactions related to Copay Adjustment Program (“CAP”): Pp. 7–8 & 22; Exs. 12, 31 & 74–75	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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		disadvantage if its competitors secured the information.			
Redactions related to Quinton Kinne: Pp. 8–9 & 22; Exs. 64 & 76–87	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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Redactions related to Daphne Longbothum: Pp. 9 & 23; Exs. 88–96	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Redactions related to William Shontz: Pp. 10–11 & 23–24;	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive	None	None

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Exs. 64, 82 & 97–114	exhibits contain sensitive business information, including the administration of the CarePath program.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	alternative is available or practicable.		
Redactions related to Alison Barklage: Pp. 11–12 & 24; Exs. 74 & 115–27	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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		disadvantage if its competitors secured the information.			
Redactions related to John Hoffman: Pp. 12–13 & 25; Exs. 10, 16, 20 & 128–30	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None

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Redactions related to L.D. Platt: Pp. 13 & 25; Exs. 19 & 131–139	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Redactions related to Leigh Wyszowski: Pp. 13–14 & 25;	JJHCS requests the sealing of documents and related discussions in the October 25 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these documents and	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive	None	None

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Exs. 81 & 140–46	exhibits contain sensitive business information, including the administration of the CarePath program.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	alternative is available or practicable.		